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12 *Attorney for Defendants*

13 *Richard T. Warner, Jr. and Western Express Inc.*

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 TRACY NICHOLE TEOFRIO,

17 Plaintiff,

18 vs.

19 RICHARD T. WARNER, JR.; WESTERN
20 EXPRESS, INC., NAVISTAR LEASING
21 SERVICES CORPORATION; DOES I
22 through XX, inclusive and ROE BUSINESS
23 ENTITIES I through XX, inclusive,
24 Defendants.

CASE NO.: 2:15-cv-01747-JAD-GWF

ECF No. 66

25 **STIPULATION TO EXTEND BRIEFING**

26 (First Request)

27 Pursuant to Local Rules ("LR") IA 6-1, Defendants, Richard T. Warner, Jr. ("Warner") and
28 Western Express, Inc. ("Western Express"), and Plaintiff, Tracy Nichole Teofrio ("Teofrio"), by and
through their respective attorneys, stipulate as follows:

1. On April 13, 2018, Warner and Western Express filed their motion for summary
judgment [ECF No. 54]. On May 4, 2018, Teofrio filed her response [ECF No. 58] and, on May 11,

1 2018, she filed a supplement to her response [ECF No. 62]. Warner and Western Express's reply to the
2 motion for summary judgment [ECF No. 54] is due May 18, 2018.

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4 2. The parties stipulate that there is good cause to extend the deadline for Warner and
5 Western Express to file their reply to the motion for summary judgment [ECF No. 54], because lead
6 counsel for Warner and Western Express is out of the country from May 18, 2018 through June 1, 2018.
7 In light of the issues raised in the motion and response, the extension will provide counsel for Warner
8 and Western Express a more reasonable opportunity to address those issue upon return to the country.
9 Therefore, the deadline to file a reply to the motion for summary judgement [ECF No. 54] should be
10 extended to June 8, 2018.
11

12 3. On May 7, 2018, Warner and Western Express filed their motion to preclude the opinions
13 and testimony of Plaintiff's expert, Paul Herbert [ECF No. 60]. Responses to this motion [ECF No. 60]
14 are due May 21, 2018. There is good cause to extend the time to respond to this motion [ECF No. 60],
15 because the normal briefing schedule does not afford Teofrio adequate time to address the issues raised
16 in the motion [ECF No. 60]. Therefore, the deadline to file a response to this motion [ECF No. 60]
17 should be extended to June 8, 2018.
18

19 4. On May 11, 2018, Warner and Western Express filed their motion to preclude the
20 opinions and testimony of Plaintiff's expert, James Loong [ECF No. 61]. Responses to this motion [ECF
21 No. 61] are due May 25, 2018. There is good cause to extend the time to respond to this motion [ECF
22 No. 61], because the normal briefing schedule does not afford Teofrio adequate time to address the
23 issues raised in the motion [ECF No. 61]. Therefore, the deadline to file a response to this motion [ECF
24 No. 61] should be extended to June 8, 2018
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IT IS SO ORDERED.

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U.S. District Judge Jennifer A. Dorsey
Dated: May 21, 2018

1 DATED: May 18, 2018.

2 HALL JAFFE & CLAYTON, LLP

3 By: /s/ Ashlie Surur

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8 *Attorney for Defendants*

9 *Richard T. Warner, Jr. and Western Express Inc.*

DATED: May 18, 2018.

LADAH LAW FIRM

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